

## Ecology closure verification issues summary

Draft closure language for the Low-Level Burial Grounds FS-1 container storage unit has proposed to calculate the number of samples necessary to verify compliance with closure performance standards, and in part, to compare sample results to the closure performance standard, is as follows:

For the purpose of utilizing the VSP software hypothesis is to compare a site mean to a fixed threshold.

The rationale for selection of this approach is Ecology MTCA guidance, Ecology publication 94-49. See Section 1.1.

Ecology has established other guidance specific to closure under the dangerous waste program. Specifically, Ecology's publication 94-111, "Guidance for Clean Closure of Dangerous Waste Units and Facilities:"

- (1) The concentrations of dangerous waste, dangerous waste constituents, and dangerous waste residues throughout the closing unit and throughout any areas affected by releases (including releases to soils, ground water, surface water, and air) from the closing unit do not exceed numeric cleanup levels determined using unrestricted site use exposure assumptions according to the Model Toxics Control Act (MTCA) Cleanup Regulation, Chapter 173-340 WAC (referred to as "clean closure levels");

See Section 2.0 of Ecology publication 94-111. Fundamentally, the "do not exceed" and comparison of a site mean to a fixed threshold are very distinct decision criteria.

While Ecology publication 94-111 is not a regulation, Ecology should consider to what extent site-specific decisions can be made at odds with closure-specific guidance, and when site-specific decision at odds with closure guidance are made, what decision criteria should be used to justify and document the use of approaches at odds with guidance. This question should be considered in the context of ensuring closure decisions are consistent program-wide.